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OK/HAV

Attorney for Defendant
FREDERICO PIZANO

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR-S-05-0174 DFL
)	
Plaintiff,)	
)	STIPULATION AND [PROPOSED ORDER]
v.)	
)	
FREDERICO PIZANO,)	Date: June 2, 2005
)	Time: 10:00 A.M.
)	
)	Judge: Hon. David F. Levi
Defendant.)	

IT IS HEREBY STIPULATED by and between the parties hereto through their respective counsel, RICK BENDER, Assistant United States Attorney, attorney for Plaintiff, LINDA HARTER, Assistant Federal Defender, attorney for defendant, that the current Status Conference date of May 19, 2005 be vacated and a new Status Conference date of June 2, 2005 at 10:00 a.m. be set.

Defense counsel has not received a written plea offer in this case. The parties are engaged in negotiations to resolve this case.

It is further stipulated and agreed between the parties that the period beginning May 19, 2005 to June 2, 2005, should be excluded in computing the time within which the trial of the above criminal

1 prosecution must commence for purposes of the Speedy Trial Act for
2 defense preparation. All parties stipulate and agree that this is an
3 appropriate exclusion of time within the meaning of Title 18, United
4 States Code, Section 3161(h)(8)(iv) (Local Code T4) and that the ends
5 of justice to be served by a continuance outweigh the best interests of
6 the public and the defendant in a speedy trial.

7 Dated: May 19, 2005

8 Respectfully submitted,

9 QUIN DENVIR
10 Federal Defender

11 /S/LINDA HARTER
12 LINDA HARTER
13 Assistant Federal Defender
14 Attorney for Defendant
15 FREDERICO PIZANO

14 MCGREGOR W. SCOTT
15 United States Attorney

16 Dated: May 19, 2005

17 BY: /S/RICK BENDER
18 RICK BENDER
19 Assistant U.S. Attorney
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26 Stipulation and Order/Frederico Pizano/Cr-S-05-174
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ORDER

Based on the parties' stipulation and good cause appearing therefrom, the Court hereby adopts the stipulation of the parties in its entirety as its order. The Court specifically finds that the ends of justice served by the granting of such continuance outweigh the interests of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

DATED: 5/25/2005

/s/ David F. Levi
HONORABLE DAVID F. LEVI
U.S. District Judge

Stipulation and order/Frederico Pizano/Cr-S-05-174 DFL